HOUSATONIC RIVER COMMISSION

"to coordinate on a regional basis the local management and protection of the Housatonic River Valley in northwestern Connecticut"

(203) 868-7341

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August 26, 2003

Alison Wolfe MNG Center at SRA 2801 Clarendon Blvd., Suite 100 Arlington, VA. 22201

Re: Housatonic River - Human Health Risk Assessment and Ecological Risk Assessment

Dear Ms. Wolfe:

The Housatonic River Commission was created in 1979 to represent the towns of Canaan, Cornwall, Kent, New Milford, North Canaan, Salisbury, and Sharon on any issues that impact the river. We act as an advisory board for everything from applications for construction and river use to the re-licensing of the power plants on the Housatonic. Our task is working to maintain an environmentally healthy and scenic river corridor – one which today is enjoyed by boaters, fishermen, and hikers and campers.

Several HRC commissioners have participated in meetings on the Consent Decree and subsequent remediation process in Pittsfield. We have followed the dredging process, toured the GE site and the current EPA dredging site. The recent presentations on risk assessment were discussed at our last meeting and we have the following comments.

Your data clearly indicate the persistent environmental problems with PCB's in the Housatonic River. In both studies (HHRA and ERA) the evidence leaves no doubt that the removal of PCB's from the environment is desirable. Whether the "risk" is "high", "intermediate", or "low" – and whether we are discussing benthic invertebrates, amphibians, fish, birds, fish-eating mammals or human populations – one conclusion is unmistakable. PCB's are a long term, cumulative health and environmental problem and continued clean-up is necessary.

Because of the stable nature of PCB's they will remain in the sediment and water and will - for many years - continue to pollute the River and Long Island Sound if nothing more is done.

Once the GE site is remediated, the greatest mass of PCB's is within the 10 ½ miles of river and floodplain between the confluence and Woods Pond Dam (reaches 5 and 6).

We urge you to continue the removal of PCB's downriver at least as far as Woods Pond. We also believe more testing needs to be done in Rising Pond. In addition, the HRC

maintains that the Connecticut dam sites need to be monitored more closely - and not just today but for at least 25 years - to ascertain whether the expected trend of reduction of PCB levels is actually occurring. Testing in the impoundment areas is especially important prior to the removal or major repair of any of the dams along the River.

We appreciate your continued efforts in helping to ensure that the Housatonic River regain its stature as a healthy riverine system.

Sincerely yours,

Jesse Klingebiel, Chairman

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Housatonic River Commission

cc: file, HRC